

1 RICHARD A. LA CAVA  
2 LAW OFFICES OF RICHARD A. LA CAVA,  
3 A Professional Corporation  
3814 24TH STREET, SUITE 202  
3 SAN FRANCISCO, CA 94114  
4 (415) 282-8960 STATE BAR #135653  
richard@lacavalaw.com  
www.lacavalaw.com

5  
6 Attorney for Debtor(s):  
JOSHUA CHRISTOPHER BASS

7  
8 UNITED STATES BANKRUPTCY COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
10 SAN FRANCISCO DIVISION

11 In re: Case No.: 16-30713-DM  
12 JOSHUA CHRISTOPHER BASS, CHAPTER 13  
13 Debtors. REQUEST FOR ENTRY OF ORDER BY  
14 DEFAULT AND DECLARATION IN  
15 SUPPORT OF ORDER ALLOWING  
16 MODIFICATION and APPLICATION FOR  
APPROVAL OF ADDITIONAL ATTORNEY  
FEES

17 The undersigned declares as follows:  
18

1. I am the attorney for the debtor in above action.
2. An Amended Motion to Modify Chapter 13 Plan and Application for Approval of Additional Attorney fees was filed on September 12, 2018 Document number 49.
3. Copies of the Amended Motion to Modify Chapter 13 Plan and Application for Approval of Additional Attorney fees and the Notice And Opportunity For Hearing Re: Amended Motion to Modify Chapter 13 Plan and Application for Approval of Additional Attorney fees has been served on all the creditors in addition to the Chapter 13 Trustee.
4. Debtor(s) request that an Order Modifying the Chapter 13 Plan as proposed in the attached application be granted.
5. The undersigned declares that my office has not received a request for a hearing within the time provided.

1 I declare under penalty of perjury of the laws of the United States of America, that the  
2 foregoing information is true and correct.

3 Dated: November 13, 2018

Richard A. La Cava/s/

4 Richard A. La Cava

5 Attorney at Law

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

1 PROOF OF SERVICE BY MAIL

2 I declare that:

3 I am employed in the City and County of San Francisco, State of California. I am over the  
4 age of eighteen years and not a party to the within action. My business address is 3814 24th Street,  
5 Suite 202 San Francisco, California 94114.

6 On November 13, 2018, I Served the within:

7 REQUEST FOR ENTRY OF ORDER BY DEFAULT AND DECLARATION IN SUPPORT OF  
8 ORDER ALLOWING MODIFICATION and APPROVAL OF ADDITIONAL ATTORNEY  
FEES

9 On the parties in said cause by placing a true and correct copy thereof in an envelope with postage  
10 thereon fully prepaid, thereafter properly sealing said envelope and depositing it in the United States  
11 mail at San Francisco, California, addressed as follows:

12 David Burchard Chapter 13, Trustee **Served via ECF Only**  
13 P. O. Box 8059  
Foster City, CA 94404

14 The United States Trustee **Served via ECF Only**

15 American Express  
16 Attn: Bankruptcy Dept.  
17 PO Box 981540  
El Paso, TX 79998

18 American Express  
19 PO Box 297871  
20 Fort Lauderdale, FL 33329-7871

21 Atty General Civil Trial Div US Dept Of  
22 Justice Civil Trial Sec Ben Franklin Sta  
23 PO Box 683  
Washington, DC 20044-0683

24 Brian Gregor  
25 c/o Daniel L. Balsam  
The Law Offices of Daniel Balsam  
26 2601C Blanding Avenue, #271  
Alameda, CA 94501

27 Capital One  
28 Attn: Bankruptcy  
15000 Capital One Dr

1 Richmond, VA 23238-1119

2 Capital One Bank USA, NA  
3 Attn: Bankruptcy Dept.  
4 PO Box 30285  
Salt Lake City, UT 84130-0285

5 Carole Meiner  
6 c/o Daniel L. Balsam  
7 The Law Offices of Daniel Balsam  
2601C Blanding Avenue, #271  
Alameda, CA 94501

9 Chase Bank USA, N.A.  
10 Attn: Bankruptcy Dept.  
11 PO Box 15298  
Wilmington, DE 19850-5298

12 Citibank  
13 50 Northwest Point Road  
Elk Grove Village, IL 60007

14 Citibank Citicorp Credit/Best Buy  
15 Attn: Centralized Bankruptcy  
16 PO Box 790040  
Saint Louis, MO 63179-0040

17 Credit First N.A.  
18 Attn: Bankruptcy Dept.  
19 PO Box 81315  
Cleveland, OH 44181-0315

20 Credit First/CFNA  
21 Attn: Bankruptcy Dept.  
22 PO Box 818011  
Cleveland, OH 44181-8011

23 Cynthia Hecker  
24 c/o Daniel L. Balsam  
25 The Law Offices of Daniel Balsam  
26 2601C Blanding Avenue, #271  
Alameda, CA 94501

27 Daniel Barrett  
28 c/o Daniel L. Balsam  
The Law Offices of Daniel Balsam

1 2601C Blanding Avenue, #271  
2 Alameda, CA 94501

3 Daniel L. Balsam  
4 The Law Offices of Daniel Balsam  
5 2601C Blanding Avenue, #271  
6 Alameda, CA 94501

7 Derek Hill  
8 c/o Daniel L. Balsam  
9 The Law Offices of Daniel Balsam  
10 2601C Blanding Avenue, #271  
11 Alameda, CA 94501

12 Erik Hellman  
13 c/o Daniel L. Balsam  
14 The Law Offices of Daniel Balsam  
15 2601C Blanding Avenue, #271  
16 Alameda, CA 94501

17 Fenwick Crecy  
18 c/o Daniel L. Balsam  
19 The Law Offices of Daniel Balsam  
20 2601C Blanding Avenue, #271  
21 Alameda, CA 94501

22 Firstsource Advantage, LLC  
23 205 Bryant Woods South  
24 Buffalo, NY 14228

25 Franchise Tax Board  
26 Attn: Bankruptcy Section, MS A-340  
27 PO Box 2952  
28 Sacramento, CA 95812

29 Heather Byrnes  
30 c/o Daniel L. Balsam  
31 The Law Offices of Daniel Balsam  
32 2601C Blanding Avenue, #271  
33 Alameda, CA 94501

34 Internal Revenue Service  
35 PO Box 7346  
36 Philadelphia, PA 19101-7346

37 IRS Special Procedures Services

1 Attn: BK Mail Code 1400S  
2 1301 Clay Street  
3 Oakland, CA 94612

4 Jason Bishop  
5 c/o Daniel L. Balsam  
6 The Law Offices of Daniel Balsam  
7 2601C Blanding Avenue, #271  
8 Alameda, CA 94501

9 John Brennan  
10 c/o Daniel L. Balsam  
11 The Law Offices of Daniel Balsam  
12 2601C Blanding Avenue, #271  
13 Alameda, CA 94501

14 Linda Hernandez  
15 c/o Daniel L. Balsam  
16 The Law Offices of Daniel Balsam  
17 2601C Blanding Avenue, #271  
18 Alameda, CA 94501

19 Luci Seed  
20 c/o Daniel L. Balsam  
21 The Law Offices of Daniel Balsam  
22 2601C Blanding Avenue, #271  
23 Alameda, CA 94501

24 Macdonald Fernandez, LLP  
25 221 Sansome Street  
26 San Francisco, CA 94104

27 Margie Barr  
28 c/o Daniel L. Balsam  
The Law Offices of Daniel Balsam  
2601C Blanding Avenue, #271  
Alameda, CA 94501

Mary O'Shea  
c/o Daniel L. Balsam  
The Law Offices of Daniel Balsam  
2601C Blanding Avenue, #271  
Alameda, CA 94501

Matt Barrett  
c/o Daniel L. Balsam

1 The Law Offices of Daniel Balsam  
2 2601C Blanding Avenue, #271  
3 Alameda, CA 94501

4 Mira Blanchard  
5 c/o Daniel L. Balsam  
6 The Law Offices of Daniel Balsam  
7 2601C Blanding Avenue, #271  
8 Alameda, CA 94501

9 Nationwide Credit, Inc.  
10 4700 Vestal Parkway E  
11 Vestal, NY 13850

12 Nationwide Credit, Inc.  
13 PO Box 26314  
14 Lehigh Valley, PA 18002-6314

15 Nicole Morton  
16 c/o Daniel L. Balsam  
17 The Law Offices of Daniel Balsam  
18 2601C Blanding Avenue, #271  
19 Alameda, CA 94501

20 Tyler Zahn  
21 c/o Daniel L. Balsam  
22 The Law Offices of Daniel Balsam  
23 2601C Blanding Avenue, #271  
24 Alameda, CA 94501

25 US Attorney Attn Chief Tax Division  
26 Federal Building 9th Floor  
27 450 Golden Gate Ave Ste 36055  
28 San Francisco, CA 94102-3432

29 Wells Fargo  
30 PO Box 94435  
31 Albuquerque, NM 87199-4435

32 Wells Fargo Card Service  
33 Attn: Bankruptcy Dept  
34 1 Home Campus, 3rd Floor  
35 Des Moines, IA 50328-0001

36 Wells Fargo Card Service  
37 Attn: Bankruptcy Dept

1      1 Home Campus, 3rd Floor  
2      Des Moines, IA 50328-0001

3      Wheel Works  
4      PO Box 81410  
5      Cleveland, OH 44181-0410

6      I declare under penalty of perjury under the laws of the United States of America that the  
7      foregoing is true and correct and that this declaration was executed at San Francisco, California.

8      Dated: November 13, 2018

Richard A. La Cava/s/

Richard A. La Cava  
9      Attorney at Law